

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY  
AND P.P.A. A. OVALLES AND  
WILSON OVALLES,  
Plaintiffs

v.

C.A. NO. 14-137M

SONY ELECTRONICS INC.;  
BEST BUY CO., INC.; FOXCONN  
INTERNATIONAL INC.; AND  
JOHN DOE CORPORATIONS 1-4,  
Defendants

**THE DEFENDANT SONY ELECTRONICS INC.'S MOTION FOR A PROTECTIVE  
ORDER REGARDING THE PLAINTIFFS' THREE RULE 30(b)(6) DEPOSITION  
NOTICES**

Defendant, Sony Electronics Inc. ("SEL") hereby moves for a Protective Order to limit the scope of the 30(b)(6) Depositions noticed by the plaintiffs. Specifically, SEL seeks an order limiting the duration and scope of the depositions, and ordering that the depositions not occur until the Court has had an opportunity to hear argument on the discovery motions set for hearing on June 9, 2016.

SEL relies upon the attached memorandum in support of its motion.

SONY ELECTRONICS INC.

By its attorneys,

/s/ John F. Kelleher, Esq.

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/s/ Robert J. Hafner, Esq.

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*Pro Hac Vice Counsel for Sony Electronics*

**CERTIFICATE OF SERVICE**

I, John F. Kelleher, certify that on the       day of May, 2016, a true copy of the within was filed electronically and it is available for viewing and downloading from the ECF system. Counsel of record received notice of the filing of this document electronically from the United States District Court for the District of Rhode Island.

/s/ John F. Kelleher